

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America )

v. )

LUIS FARID GONZALEZ )

*Defendant(s)*

Case No.

3-14-71140

LB

MAG

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 1, 2014 in the county of San Mateo in the  
Northern District of California, the defendant(s) violated:

*Code Section*

Title 21, United States Code,  
 Section 841(a), (b)(1)(A)

*Offense Description*

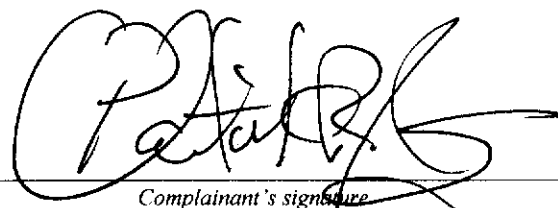
Possession with intent to distribute more than 1,000 kilograms of marijuana

Title 21, United States Code,  
 Section 846, 841(b)(1)(A)

Conspiracy to possess with intent to distribute and distribute more than 1,000 kilograms of marijuana

This criminal complaint is based on these facts:

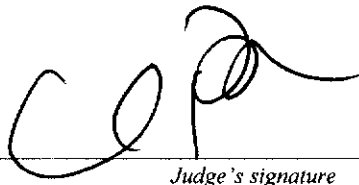
See attached affidavit of Special Agent Patrick Jones

☒ Continued on the attached sheet.

*Complainant's signature*

Patrick Jones, Special Agent DHS/HSI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: August 26, 2014

*Judge's signature*City and state: San Francisco, California

United States Magistrate Judge

*Printed name and title*

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America )

v. )

MARIO GONZALEZ )

Defendant(s)

Case No. 3 14-71140 LB

MAG

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 1, 2014 in the county of San Mateo in the  
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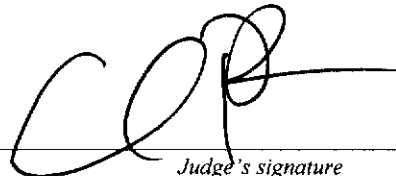
Patrick Jones, Special Agent DHS/HSI

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/26/14



Judge's signature

City and state:

San Francisco, California

United States Magistrate Judge

Printed name and title

## UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America )

v. )

Case No. )

3 - 1 4 - 7 1 1 4 0 )

JUAN HERNANDEZ )

Defendant(s) )

MAG  
LB

## CRIMINAL COMPLAINT

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Patrick Jones, Special Agent DHS/HSI

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/26/14

Judge's signature

City and state: San Francisco, California

United States Magistrate Judge

Printed name and title

## UNITED STATES DISTRICT COURT

for the  
Northern District of CaliforniaUnited States of America  
v.

JUAN VALDEZ LOPEZ

*Defendant(s)*Case No. **3-14-71140****MAG****LB**

## CRIMINAL COMPLAINT

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Patrick Jones, Special Agent DHS/HSI

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

8/26/14*Judge's signature*City and state: San Francisco, California

United States Magistrate Judge

*Printed name and title*

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America )

v. )

Case No. **3 - 14 - 71140**

LUIS ESPINOZA MENDOZA )

Defendant(s)

**MAG****LB**

## CRIMINAL COMPLAINT

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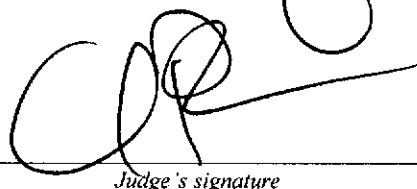

Complainant's signature

Patrick Jones, Special Agent DHS/HSI

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/26/14City and state: San Francisco, California


Judge's signature

United States Magistrate Judge

Printed name and title

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Northern District of CaliforniaUnited States of America  
v.

ESTEBAN FLORES SALAZAR

*Defendant(s)*

Case No.

3-14-71140

MAG

LB

## CRIMINAL COMPLAINT

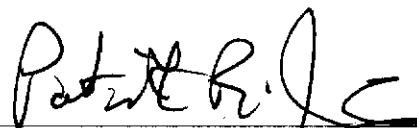
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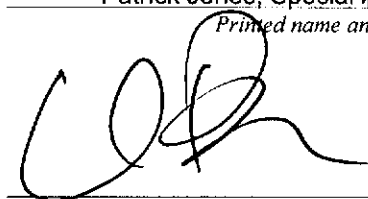
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Patrick Jones, Special Agent DHS/HSI

*Printed name and title*

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Date:

8/26/14*Judge's signature*City and state: San Francisco, California

United States Magistrate Judge

*Printed name and title*

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Northern District of CaliforniaUnited States of America  
v.

JOAN SICAIROS

Defendant(s)

Case ~~80~~-14-71140

MAG

## CRIMINAL COMPLAINT

LB

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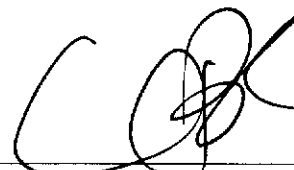
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Patrick Jones, Special Agent DHS/HSI

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/26/14

Judge's signature

City and state: San Francisco, California

United States Magistrate Judge

Printed name and title

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Northern District of CaliforniaUnited States of America  
v.

MARK RICHARD TEIXEIRA

*Defendant(s)*

Case No.

**3-14-71140**

LB

MAG

## CRIMINAL COMPLAINT

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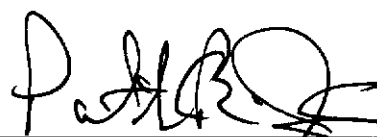
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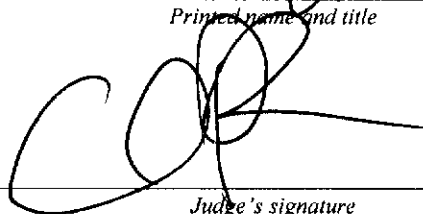
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Patrick Jones, Special Agent DHS/HSI

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

8/26/14City and state: San Francisco, California*Judge's signature*

United States Magistrate Judge

*Printed name and title*



AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Northern District of CaliforniaUnited States of America  
v.

PHIN YO VORN

*Defendant(s)*

Case No.

3-14-71140

LB  
MAG

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

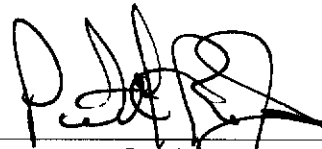
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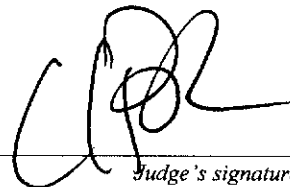
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Patrick Jones, Special Agent DHS/HSI

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

8/26/14*Judge's signature*City and state: San Francisco, California

United States Magistrate Judge

*Printed name and title*

FILED

2014 AUG 26 P 1:57

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MAG

LB

MELINDA HAAG (CABN 132612)  
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J. DOUGLAS WILSON (DCBN 412811)  
Chief, Criminal Division  
MATTHEW L. MCCARTHY (CABN 217871)  
Assistant United States Attorney  
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Telephone: (415) 436-7200  
Fax: (415) 436-7234  
Matthew.McCarthy@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUIS FARID GONZALEZ,

MARIO GONZALEZ,

JUAN HERNANDEZ,

JUAN VALDEZ LOPEZ,

LUIS ESPINOZA MENDOZA,

ESTEBAN FLORES SALAZAR,

JOAN SICAIROS,

MARK RICHARD TEIXEIRA,

and

PHIN YO VORN,

Defendants.

CASE NO. **3-14-71140**

COMPLAINT AFFIDAVIT

1 I, Patrick R. Jones, Special Agents of the Department of Homeland Security, being duly sworn,  
2 state:

3  
4 **INTRODUCTION AND AGENT BACKGROUND**  
5

6 1. I am an "investigative or law enforcement officer of the United States" within the  
7 meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who  
8 is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title  
9 18, United States Code, Section 2516.

10 2. Since March 7, 2004, I have been employed as a Special Agent with Immigration and  
11 Customs Enforcement, Homeland Security Investigations ("ICE/HSI"), and am currently assigned to the  
12 office of the Special Agent in Charge, San Francisco, California. My prior assignments included the  
13 Human Smuggling and Trafficking Group, the Contraband Smuggling Group, and the Border  
14 Enforcement Security Task Force, among other assignments. While serving as an ICE/HSI Special  
15 Agent, I have participated in numerous investigations including, but not limited to, narcotics trafficking,  
16 human smuggling, human trafficking, prostitution, money laundering, other financial crimes, and  
17 immigration violations. My training includes the Criminal Investigator Training Program, Immigration  
18 and Customs Enforcement Special Agent Training Program at the Federal Law Enforcement Training  
19 Center in Glynco, Georgia, which lasted over five months and covered numerous law enforcement  
20 topics. I have also attended many conferences, seminars, and in-service training courses sponsored by a  
21 variety of professional organizations and law enforcement agencies. My additional prior experience and  
22 training includes a Bachelor of Arts degree from the University of South Florida, with a major in  
23 Criminology; graduation from the Manatee County Law Enforcement Academy; internships with the  
24 Florida Department of Law Enforcement; and employment as a Narcotics Detective with the  
25 Okeechobee County Sheriff's Office in Florida.

26 3. I submit this affidavit in support of a criminal complaint charging LUIS FARID  
27 GONZALEZ, MARIO GONZALEZ, JUAN HERNANDEZ, JUAN VALDEZ LOPEZ, LUIS  
28 ESPINOZA MENDOZA, ESTEBAN FLORES SALAZAR, JOAN SICAIROS, MARK RICHARD

TEIXEIRA, and PHIN YO VORN (collectively, "the defendants") with violating Title 21, United States Code, Sections 841 (a)(1), (b)(1)(A) (possession with intent to distribute marijuana more than 1,000 kilograms of marijuana) and 846 (conspiracy to possess with intent to distribute and distribute more than 1,000 kilograms of marijuana). It is my understanding that the elements of Section 841(a)(1) are:

- a. The defendant knowingly manufactured marijuana; and
- b. The defendant knew that it was marijuana or some other prohibited drug.

It is my understanding that the elements of Section 846 are:

- a. There was an agreement between two or more people to possess with the intent to distribute and/or distribute marijuana; and
- b. The defendant entered into that agreement knowing its purpose and intending to help accomplish that purpose.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrants and does not set forth all of my knowledge about this matter

#### **FACTS SUPPORTING PROBABLE CAUSE**

##### **Initial Information Regarding Inbound Suspected Smuggling Vessel**

5. Early in the week of July 28, 2014, Department of Homeland Security (DHS), Homeland Security Investigations (HSI) agents received reports from the U.S Coast Guard of possible maritime smuggling activity off of the coast of California. Specifically, Coast Guard aerial surveillance assets observed several vessels in the territorial water of Mexico approaching the territorial waters of the United States. On or about July 29, 2014, the U.S. Coast Guard apprehended two vessels, seizing fuel from one and approximately 12,000 pounds of marijuana from the other. The Coast Guard reported that another of the vessels observed during the week remained at sea, with a heading toward the central or northern coast of California. HSI offices throughout the region were placed on alert.

6. On August 1, 2014, HSI agents went to the coastal area between Santa Cruz and San Mateo Counties, in the Northern District of California, to conduct a counter-maritime-smuggling

operation. Based on the information provided by the Coast Guard, as well as information regarding prior smuggling operations over the previous 18 months, agents suspected that the vessel being tracked by the Coast Guard was involved in marijuana smuggling.

7. HSI agents, assisted by other DHS agents and task force officers (TFOs), set up surveillance points between Wilder Ranch State Park and Ano Nuevo State Park. Both locations were sites of previous marijuana smuggling "off-loads." Surveillance crews were looking for possible "off-load crews" – people who receive the marijuana from smuggling vessels, and load it into trucks for transportation and distribution. For this reason, the agents were looking for large-capacity vehicles, capable of secreting and hauling large loads of marijuana. Specifically, they were advised to look for SUVs, U-Haul trucks, rental RVs, work vans, and similar vehicles. As the operation progressed, various state, local, and federal law-enforcement agencies lent assistance.

#### Surveillance of Suspects Vehicles and Persons

8. Around 8:55 p.m. on August 1, surveillance units near Davenport, California observed a U-Haul van arrive at their location. Agents observed that three Hispanic males occupied the U-Haul van. The U-Haul van entered the parking lot of a nearby restaurant, where it was met by another Hispanic male, who approached on foot. He directed the U-Haul van to back into a parking space. The U-Haul van did so, and the occupants remained in the van with the engine running. Agents then observed a second vehicle in the parking lot, which was a white-colored work van.

9. Shortly after the U-Haul's arrival 2-3 more male subjects arrived and met with the occupants of the U-Haul van. The group of men then walked across the street to the beach, and were seen lighting off three airborne fireworks (bottle rockets) from the beach before walking back to the parking lot. The group was only on the beach for 15-30 minutes total. Based on the observations to this point, agents suspected that the fireworks were intended to be a signal to a boat at sea.

10. As the evening progressed, agents received more information from the Coast Guard regarding the position of a large, fast-moving vessel. The Coast Guard indicated that the vessel was heading toward Ano Nuevo State Park. The surveillance teams then divided into two groups: one near Ano Nuevo State Park, and one remaining with the suspect vehicles and subjects in Davenport.

11. Between 9:30 and 10:00 p.m., when the vessel was reported to be approximately 15

1 minutes from Ano Nuevo State Park, the subjects in Davenport entered the U-Haul and white van. The  
2 vehicles departed the parking lot and headed north-bound on Highway 1. Around 10:15-10:30 p.m., the  
3 vehicles entered the Whitehouse Creek entrance to Ano Nuevo State Park, and drove onto a trail headed  
4 for the beach. The surveillance teams then took up positions along Highway 1 in the area where the  
5 vehicles entered the state park. During this time, the Coast Guard confirmed a radar signature consistent  
6 with the suspected drug smuggling vessel's just off the Ano Nuevo shoreline.

7 High-Speed Pursuit and Capture of Six Suspects

8 12. After more than two hours, the suspect vehicles drove back from the beach toward the  
9 entrance of the park. The entrance of the park had been blocked by an unmarked law-enforcement  
10 vehicle, and there were numerous law-enforcement officers at the scene. When the drivers of the  
11 suspect vehicles approached the gate, they accelerated and crashed through the fence, fleeing at high  
12 speed. A high-speed chase then ensued, with the suspect vehicles being pursued by numerous law-  
13 enforcement agencies. At this time, several suspects were also seen fleeing on foot back toward the  
14 beach.

15 13. The white van drove for approximately one half of a mile before the driver abandoned it  
16 and fled on foot. (It is possible that more than one occupant fled the white van at this time.)

17 14. The U-Haul van continued southbound on Highway 1 at speed exceeding 100 miles per  
18 hour, while being pursued by law-enforcement vehicles with active emergency lights and sirens. As the  
19 U-Haul van approached the Scott's Creek area of Santa Cruz county, several emergency vehicles with  
20 activated lights were blocking the Highway. (These turned out to be fire rescue trucks fighting an  
21 unrelated brush fire.) These vehicles prevented the U-Haul from continuing, and the driver stopped the  
22 van.

23 15. Agents ordered the driver to exit the vehicle, which he eventually did. He was then taken  
24 into custody. Agents observed that the driver's jeans and shoes were soaking wet and covered in sand  
25 (as though he had been wading in surf). The driver of the U-Haul van was identified as LUIS  
26 ESPINOZA MENDOZA.

27 16. A protective sweep of the U-Haul van revealed that the driver was the only occupant.  
28 However, the van was completely loaded with large cube-shaped bundles, and the odors of marijuana

1 and gasoline emanated from the U-Haul van. A further search of the U-Haul van revealed numerous  
2 bales of marijuana, as well as a small boat motor, wet clothing, and cellular telephones.

3 17. Examination of the white work van (which had been abandoned at this time) revealed that  
4 it was also fully loaded with bales of marijuana.

5 18. The total amount of marijuana seized from the vehicles was in excess of 5,000 pounds.

6 19. Agents then conducted a sweep of the beach in an attempt to locate the suspects that had  
7 fled. Agents were able to find and detain five additional suspects at this time: LUIS FARID  
8 GONZALEZ, MARIO GONZALEZ, ESTEBAN FLORES SALAZAR, JOAN SICAIROS, and MARK  
9 RICHARD TEIXEIRA. These five, in addition to MENDOZA, were arrested and transported to San  
10 Mateo County Jail.

11 Interviews With Defendants

12 20. At the jail, all six suspects were advised of their Miranda rights. LUIS FARID  
13 GONZALEZ and MARIO GONZALEZ invoked their rights and declined to speak with agents.  
14 SALAZAR, SICAIROS, TEIXEIRA, and MENDOZA signed waivers of their rights, and gave  
15 statements.

16 21. MENDOZA explained to the agents that he had come to the United States three months  
17 earlier, with the assistance of a "coyote" (an alien smuggler). He had agreed to help the coyote smuggle  
18 drugs into the United States in order to pay off the price of coming to the United States. He also  
19 indicated that he would be paid an undisclosed sum of money for his assistance. MENDOZA told the  
20 agents that he came to the area in the white work van with another person, who was not apprehended.  
21 He confirmed that the group of men had come to meet a boat full of marijuana, and to off-load the  
22 contents of that boat. He indicated that he did not know the destination of the marijuana. He further  
23 explained that the men off-loaded the boat by passing bales in a chain, from person to person, from the  
24 boat to the vehicles.

25 22. SALAZAR explained to the agents that he was from Sinaloa, Mexico, and that he was  
26 one of four men who had driven the boat full of marijuana from Mexico to California. He explained that  
27 he was a deckhand on the boat, along with another man, and that two others navigated and drove the  
28 vessel. He indicated that the two men who navigated and drove the vessel were not among the six



1 arrested by the police that night. SALAZAR told agents that he became involved with the smuggling  
2 effort through a friend. He explained that, in exchange for his assistance with the smuggling operation,  
3 he would be smuggled into the United States, and paid \$3,000. SALAZAR admitted that he knew the  
4 vessel contained marijuana.

5 23. SICARIOS also admitted that he came on the boat from Mexico. He said that he did not  
6 have to pay for the journey on the boat, but denied being paid any additional money. He also stated that  
7 there were four people on the boat, and that they had come from Mexico in about 5 days.

8 24. TEIXEIRA stated that he lives in San Jose, California, and was offered the "job" of  
9 unloading the marijuana through a friend-of-a-friend. He stated that he was told to pick up the U-Haul  
10 van and bring it to Davenport. He would then follow the other van. He admitted to helping to carry  
11 packages that smelled like marijuana and gasoline. He believed that the eventual destination of the van  
12 was Los Angeles. TEIXEIRA said he was to be paid \$3,000 for his work.

13 Location and Arrest of Three Additional Suspects

14 25. On August 2, 2014, at approximately 10:15 a.m., California Park Ranger Baille observed  
15 three men walking southbound on Highway 1 approximately one mile north of the entrance to Ano  
16 Nuevo State Park. Ranger Baille had been informed on August 1 about the suspected smuggling  
17 operation, and had been instructed to look out for suspicious persons or activities. Ranger Baille  
18 observed that the men were walking on an isolated stretch of road, and that no vehicles were visible for  
19 over ½ mile in either direction. The men had soiled or sandy clothing, two of the men had pants that  
20 appeared to be wet below the knees, and one of the men had no shoes.

21 26. Ranger Baille stopped the men to conduct a welfare check and investigate further. She  
22 asked the men if they were ok, and what they were up to. One of the men, later identified as PHIN  
23 VORN, said that he was "just walking" and saw the other men and decided to follow them to a phone.  
24 The other two men did not speak English. Ranger Baille spoke to them in Spanish, and they indicated  
25 that they were Mexican nationals, and had no valid U.S. identification.

26 27. At this point, Ranger Baille's supervisor informed her by radio that there were suspects  
27 from the previous evening who had fled on foot, and had not been apprehended. Ranger Baille detained  
28 the three men, and called for back-up units. The two Mexican nationals were later identified as JUAN



1 HERNANDEZ (of Sinaloa, Mexico) and JUAN VALDEZ LOPEZ (of Ensenada, Mexico).

2 28. San Mateo County Sheriff's Deputy Moore arrived to assist Ranger Baille. He was  
3 aware that suspects from the previous evening had fled. He noted that the suspects were dirty and wet,  
4 and that one did not have shoes. He also noted that they were found on a remote stretch of road without  
5 any means of transport or equipment for hiking or backpacking. He noted that they did not have food,  
6 water, money, or any means of buying supplies. Based on his observations and their appearance, he  
7 believed that they were the suspects who had fled police the previous evening, and placed them under  
8 arrest. They were then transported to the San Mateo County substation in Half Moon Bay.

9 29. A criminal background check of LOPEZ revealed that he had been arrested on December  
10 25, 2013 for possession of marijuana for sale and transportation of marijuana in San Luis Obispo,  
11 California. Upon further investigation of this arrest, I am informed and believe that LOPEZ was  
12 arrested at that time while smuggling marijuana into the state by boat.

13 30. Upon arriving at the substation, Deputy Moore was informed that one of the men  
14 detained the previous evening had told officers that a Cambodian man named "Phin" had fled with two  
15 Hispanic males when the police arrived.<sup>1</sup>

16 31. Based on the observations of the defendants' appearance and location, the statements of  
17 the other defendants, and LOPEZ' criminal record, I believe that VORN, HERNANDEZ, and LOPEZ  
18 were all involved in the smuggling operation. In particular, I believe that HERNANDEZ and LOPEZ  
19 were the two men responsible for piloting and navigating the boat from Mexico to California.

20 32. On August 2, 2014, the Coast Guard recovered an abandoned 40' long "panga" boat at  
21 sea approximately 7 miles from the landing site at Ano Nuevo State Park. This type of open boat is  
22 consistent with vessels used to smuggle marijuana from Mexico into California. Based on my training  
23 and experience, I am aware that these vessels are often abandoned or sunk once the marijuana is  
24 delivered. Based on the type of vessel, its location, and the timing of the discovery, I believe that the  
25 vessel recovered by the Coast Guard on August 2, 2014 was the vessel used to deliver the marijuana  
26 seized on August 1, 2014 in the area of Ano Nuevo State Park.

27  
28 <sup>1</sup> I am aware of the identity of the defendant who provided this information. However, in order  
to protect that defendant from possible retaliation, I am not including his name in this public document.

1 State Court Proceedings

2 33. All nine of the defendants described above were charged in San Mateo County Superior  
3 Court with felony transportation of marijuana in violation of California Health & Safety Code section  
4 11360(a) and felony possession of marijuana for purpose of sale in violation of California Health &  
5 Safety Code section 11359 on August 4, 2014.

6 34. On August 13, 2014, the following defendants pleaded nolo contendere to felony  
7 transportation of marijuana:

- 8 a. MARK RICHARD TEIXEIRA,
- 9 b. ESTEBAN FLORES SALAZAR,
- 10 c. LUIS ESPINOZA MENDOZA,
- 11 d. JOAN SICAIROS, and
- 12 e. LUIS FARID GONZALEZ.

13 Each of the defendants was sentenced to one year in jail. The remaining defendants have pleaded not  
14 guilty to those charges.

15 Summary

16 35. Based upon all of the above, I believe that the nine defendants identified herein were  
17 involved in a conspiracy to import over 5,000 pounds of marijuana from Mexico to the United States, to  
18 possess that marijuana with the intent to distribute it to others, and to distribute it to others. I further  
19 believe that the defendants did in fact possess the marijuana with the intent to deliver it to others. I  
20 believe that the defendants had the following roles:

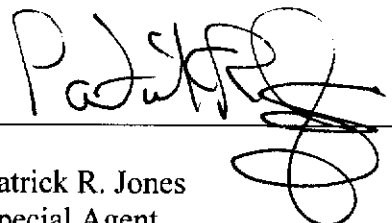
- 21 a. Boat Crew
  - 22 i. JUAN HERNANDEZ,
  - 23 ii. JUAN VALDEZ LOPEZ,
  - 24 iii. ESTEBAN FLORES SALAZAR, and
  - 25 iv. JOAN SICAIROS.
- 26 b. Off-load Crew / Drivers
  - 27 i. LUIS ESPINOZA MENDOZA,
  - 28 ii. LUIS FARID GONZALEZ,

- iii. MARIO GONZALEZ,
- iv. MARK RICHARD TEIXEIRA, and
- v. PHIN VORN.

**CONCLUSION**

36. Based upon the facts set forth in this affidavit, I submit that there is probable cause to believe that each of the defendants described above violated Title 21, United States Code, Section 841 (a)(1), (b)(1)(A) and 846, possession of over 1,000 kilograms of marijuana with the intent to distribute and conspiracy to possess with intent to distribute and to distribute over 1,000 kilograms of marijuana.

37. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

  
Patrick R. Jones  
Special Agent  
Department of Homeland Security

Sworn to before me this 25<sup>th</sup> day of August, 2014.

  
HONORABLE LAUREL BEELER  
United States Magistrate Judge

**PENALTIES AS TO EACH DEFENDANT:**

<b>Violation</b>	<b>Statutory Penalties</b>
21 U.S.C. § 841(a)(1), (b)(1)(A)	<p>Imprisonment of no less than 10 years and no more than life</p> <p>A term of supervised release of no less than 5 years and no more than life</p> <p>A fine of up to \$10,000,000</p> <p>A special assessment of \$100</p> <p>Deportation if not a citizen of the United States</p>
21 U.S.C. § 846, 841(b)(1)(A)	<p>Imprisonment of no less than 10 years and no more than life</p> <p>A term of supervised release of no less than 5 years and no more than life</p> <p>A fine of up to \$10,000,000</p> <p>A special assessment of \$100</p> <p>Deportation if not a citizen of the United States</p>